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August 8, 2025

**VIA ECF**

Hon. Margaret M. Garnett  
United States District Court, Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007

**RE: WENDY J. WILLIAMS HUNTER, et al. v. MORRISSEY, et al.**  
**Docket No.: 1:25-cv-5107-MMG**

Dear Judge Garnett:

Miami Entertainment Law Group, which represents the plaintiffs in the above-referenced matter, submits this correspondence to the Court on Plaintiffs' behalf to respectfully request an adjournment of the August 28, 2025 Initial Pretrial Conference with the Court, in accordance with Rule I. B. 5. of Your Honor's Individual Rules & Practices.

- (1) The reason for the proposed adjournment or extension: Defendants have not yet been served with the Summons and Complaint, which means that counsel for all parties will not be present at the Initial Pretrial Conference. Pursuant to Fed. R. Civ. P. 4(m), Plaintiffs have until September 15, 2025 to serve the Defendants in this matter. Plaintiffs propose that the Initial Pretrial Conference be adjourned until after the 90-day deadline has passed.
- (2) The original date: August 28, 2025
- (3) The number of previous requests for adjournment: 0
- (4) Whether the other party or parties consent and, if not, the reason given for refusing to consent: Although no other parties have been served in this action, our office contacted Matthew Kelly Flanagan regarding our intended request to adjourn the Initial Pretrial Conference being that Mr. Flanagan filed a notice of appearance in this matter on behalf of defendants Linda Redlisky and Rafferty & Redlisky LLP. Mr. Flanagan advised that since his clients have not yet appeared, he takes no position regarding our request to adjourn the conference, but that it seems appropriate to adjourn the conference given that none of the defendants have yet been served.
- (5) Proposed alternative dates, including any other scheduled dates that may be affected by the requested adjournment or extension: October 9, 2025; no other dates are currently scheduled in this matter that may be affected by the requested adjournment.

We thank the Court for its kind consideration of this matter.

Respectfully,

Letter to Court – Hon. Margaret M. Garnett

August 8, 2025

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LaShawn N. Thomas

  
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Celeste McCaw

CC: Counsel for Defendants (via ECF)